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I provide services to people with a broad range of disabilities through an Independent Living Center.

A. STS Issues

1 Length of time that the communications assistant (CA) stays with the call: The FCC should require STS CAs to stay with the call for a minimum of 20 minutes, rather than the present minimum 15. Even for an experienced STS user, establishing effective communication with the STS CA can take an extended period of time, particularly if one must alternate between voice and a talking PC to determine which is more effective.

1a When effective communication begins: It begins when the STS CA can understand the user sufficiently so that the user can complete the call satisfactorily.

2 Muting the voice: STS users should have the option of having their voices muted, to avoid distraction and embarrassment. This would encourage many people to use STS who would not otherwise do so.

3. Confidentiality Explanation: STS CAs must tell users that the information relayed on the call is confidential. Once a user has been informed that can be noted in their profile and that information does not need to be repeated. This requirement applies to users with or without speech disabilities.

4 Easy 711 STS Access: Users must have easy access to STS by dialing 711. One way to do this is with a prompt or menu. Some STS users have cognitive problems and cannot activate a 10 digit number. Other STS users have limited dexterity and difficulty dialing, making multiple keystrokes a problem. All potential STS users (estimated at 500,000) deserve easy access to STS.

Forcing only STS users to ask for their particular service detracts from the functional equivalency of STS compared with TTY relay (also offered through 711).

Providers must ensure that all STS users fully understand that they have the opportunity to have their telephone numbers branded for STS and to complete an STS profile. Using that profile can greatly increase ease of access to STS and ensure appropriate call handling. Each provider must customize the Caller Profile form for STS users by including whatever information the user thinks will be helpful to the CA and beneficial to the STS user or the party being called, up to 100 words. If a user with a profile and branded STS number makes or receives an STS call, such information will come up on the CA's screen. The form should be simple to fill out and it should be possible to send it in a variety of ways (either through; the CA, email, fax, directly online, etc.) Dialing 711 with an STS branded phone should reach STS directly without going through another CA.

5. Silence on the line: When the caller with the speech disability is silent without saying good-bye, the CA will not disconnect from either party until 60 seconds has passed. We make this request as cognitive and dexterity problems may necessitate this silence. A fellow STS user was recently on a call during which the other party understood that STS caller was getting him a phone number but the CA did not. The CA wrongly assumed that the call was over, so the CA disconnected.

6 STS Reimbursement Rates

a. Increasing the reimbursement rate to ensure outreach: We are pleased that FCC is continuing to provide for Speech-to-Speech Outreach by establishing a \$2.7248 per minute rate for interstate STS. With respect to interstate calling, the providers are now receiving adequate financial incentive to identify and train the majority of potential STS users who do not know that STS exists. I urge that the FCC continue with that high rate on an ongoing basis.

General telephone service for the public is administered by the FCC in a way that gives providers maximum economic incentive to recruit as many users as possible. STS users should receive similar encouragement to use the telephone. The FCC should encourage increased use of telephone service by STS users for all calls, not just interstate calls

b. Supplementing Intrastate Rates: Adding sufficient sums (paid by the FCC) to current intrastate rates nationally, as the FCC is now doing for the STS interstate rate, can provide incentive.

c. The MARS rate: This rate alone is not adequate to generate the necessary STS outreach. It is insufficient given that providers have no financial incentive to do STS outreach. The MARS rate cannot fund both STS and the marketing necessary for STS to reach a significant portion of the speech disability population.

d. Current incentives for other speech disability assistive technology must be applied to STS. The infrequent use of STS appears to be directly related to funding. It is startling to note that thousands of Americans with speech disabilities use assistive hardware and software to help them communicate, while only a few hundred consumers use the assistive service available through Speech-to-Speech. The reason for this difference appears to be funding.

There is a thriving industry, largely funded through health care channels, producing augmentative and alternative communications devices (also called AAC devices or voice output computers). AAC manufacturers and sales organizations have successfully lobbied to receive a reasonable profit from reimbursements through medical insurance. Many professionals benefit by providing this technology, including medical, legal and marketing specialists.

At the same time, no potential advocate for STS consumer training gains enough financially from STS to be motivated to lobby on its behalf. This must change! STS reimbursement must be high enough for STS to have such incentives.

7 STS Outreach Needs and Methods:

a. Multiple Contacts: Training individual users one to one often requires multiple contacts. Very brief customer introduction to STS generally leads to a lack of long-term use, while greater success results from multiple home visits. For this reason, we strongly recommend that STS outreach be funded to allow 3-10 home visits which has been previously successful. Speech Language Pathologists (SLPs) are best qualified to make these home visits. SLPs will spend much time identifying potential users, who are very hard to find. The cost of such services must be built into the reimbursement rate and such costs would not exceed the current VRS reimbursement rate. STS users should receive necessary CA services and consumer training, just as VRS users and the general public do.

b. No known STS outreach method successfully reaches consumers in large numbers. If STS providers have sufficient financial incentive, they will do the necessary research to find them. While deaf consumers can use IP Relay by transferring telephone skills from previous relay experience, many new STS and IP STS users have never before used the telephone. Hence, learning to use these services will be a significant lifestyle change and will require many home training visits. Social and psychological barriers to telecommunications, combined with the

rampant poverty among people with speech disabilities (PSDs), make it unlikely that many PSDs will use IP STS unless there are sufficient home visits.

c. Efforts are in progress to validate effective STS outreach strategies. Once that is done, we can assume that providers will choose the most effective strategies, as that will maximize call volume and profits. An STS and IP STS Advisory Council must be established and work to ensure that each potential user nationwide will be identified and trained. The Advisory Council will develop national short and long range plans that will increase consumer awareness and education.

B. IP STS Issues

1 IP-STS Reimbursement rate: We do not agree with the FCC that IP STS should be compensated at the same per-minute rate as STS, unless additional and adequate outreach funds are provided. The reimbursement rate for IP STS, (if recognized as a service eligible for compensation from the Interstate TRS Fund), should be quite large. For IP STS to be effective, the reimbursement rate must be high enough to give providers the incentive to identify and recruit users. Because there are so few people with speech disabilities, the reimbursement rate will need to be extremely high, possibly higher than the VRS reimbursement rate.

In addition to being small, this population is also exceptionally difficult to identify, due to its very low rate of employment and other isolating factors. This massive unemployment is attributable to high rates of brain injury in this group from conditions like cerebral palsy.

2. IP-STS Consumer training and Outreach. Unlike other IP consumers who transferred telephone skills (both technical and social skills) from their previous use to IP Service, many new IP STS users never have used the telephone. Hence, learning to use IP STS will be a significant lifestyle change. Other STS outreach issues described above apply to IP-STS.

C. Other STS and IP STS Issues

1. Administration

STS and IP STS should be administered nationwide in a manner similar to VRS with the marketplace determining the number of providers. A nationwide STS service is reasonable given the small number of potential users. Indeed, when the number of potential users (approximately 500,000 to 1,000,000 for STS and IP STS combined) is divided among the states, some states would have fewer than 500 potential users. Moreover, encouraging competitive STS and IP STS providers will result in a greater variety of services and better quality service. We have already seen the benefits of competition in the case of VRS, and encourage competitive STS and IP STS providers.

In the case of IP STS, since calls cannot be jurisdictionalized between interstate and intrastate, the FCC has ample authority to mandate a nationwide approach and encourage competitive providers. Moreover, to the extent there are states that do not have the resources or otherwise do not wish to administer state STS programs due to there being only a limited number of potential STS users, the Commission has the authority under Section 225 of the Act to administer STS programs within those states.

2. Single National Provider and nationwide administration: We support the proposal for a single, nationwide provider to offer both interstate and intrastate STS. We maintain that the Commission has the authority to mandate such an approach to the provision of service. STS and IP-STS can be administered nationwide in a manner similar to VRS.

a. FCC authority to approve nationwide providers of STS and IP-STS is similar to its authority to have national VRS providers. A national service would be reasonable given the small number of potential users. When this small number (perhaps 500,000 to 1,000,000 for STS and IPSTs

combined) is divided among the states, some states have less than 500 potential users. No state has sufficient call volume to justify a state run STS service. Economy of scale is a primary reason to make STS a national service.

b. If the marketplace justifies it, there could be multiple providers for both services, similar to that provided for VRS. This is based on the fact that competition improves quality of service.

i. Each provider will serve the whole country from one call center with dedicated CAs. Because these CAs only process STS and IP-STS calls, they will develop sufficient expertise to provide good service.

ii. The small speech disabled population is limited in its advocacy. A large proportion have multiple disabilities (such as ALS and severe CP) which prevent self-advocacy. It is not reasonable that Congress intended that such a small and limited population would provide the required State level advocacy. Fairness points to a need for administering STS and IP-STS nationwide. It is unfair to require these services to be administered in a manner which prevents 95% of potential users from learning to use them and puts an unnecessary burden on many states. There are not enough state level STS consumer advocates to monitor either program if they are state administered. Having nationwide STS and IP-STS programs will ensure that STS consumer rights are adequately protected.

iii. No state has sufficient call volume to justify a state run STS or IP-STS service. Economy of scale is a primary reason to make them national services.

iv. Costs for intrastate STS and IP-STS calls and a pro-rated share of outreach costs will be reimbursed by the states. IP STS users should be accorded access to the new ten digit numbering and emergency call services available to other IP users.

v. Making STS and IP-STS national services under the FCC, as VRS is, would give the FCC rate setting ability over all STS calls, rather than just interstate rates.

c. CA Compensation: STS and IP-STS CA compensation must be adequate. CAs will be paid enough to establish a career path, just as video relay interpreters are. If video relay users have the right to receive service from interpreters who have the motivation to provide good service (because of adequate compensation and a career path), then STS users have the same right.

d. Supervision: Supervisors and CAs should receive regular training from qualified speech language pathologists (SLPs), so that they will have a thorough understanding of the physiology of STS and IP-STS users. Such trainers would have the ethical responsibility (because of the SLP code of ethics) to ensure a much higher quality of service than currently exists. This high quality of CA service would help stop users from abandoning STS because of low quality service. Such ethical responsibility cannot be undertaken by the providers as it may conflict with obtaining maximum profit as demanded by stockholders. Using trainers bound by the SLP code of ethics ensures that this ethical responsibility will be met.